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PotlatchDeltic Land and Lumber, LLC

St. Maries Complex
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Dan Meyer
Air Permits and Toxics Branch, Air and Radiation Division, U.S. EPA Region 10
1200 Sixth Avenue, Suite 155
Mail Code 15-H13
Seattle, WA 98101-3188
Meyer.Dan@epa.gov

Re: Kiln 6 Deviation Reporting: mNSR Permit R10TNSR01801; PSD Permit R10PSD00102

Dear Dan:

On December 3, 2019, PotlatchDeltic orally reported deviations from a work practice standard to the U.S. Environmental Protection Agency (EPA) Region 10 Clean Air Act Compliance Manager. EPA confirmed receipt of that report by email on December 4, 2019.

The required method for follow-up deviation reporting is confusing under the relevant conditions of the two new permits issued to PotlatchDeltic's mill in St. Maries, Idaho. Condition 5.4 of the mNSR Permit and condition 5.2 of the PSD permit are identical. In accordance with those conditions, PotlatchDeltic promptly reported to Region 10 (206-553-1331) once the deviations were detected, following review of the collected data. Conditions 5.4 (mNSR) and 5.2 (PSD) both state: *A written notice shall be submitted within 10 working days of the occurrence.* That instruction conflicts with Conditions 5.4.2.2 (mNSR) and 5.2.2.2 (PSD) that dictate a reporting schedule for work practice deviations as follows: *For all other deviations from permit requirements, the deviations shall be reported semi-annually in the annual report required by Condition 5.5 [or 5.3] and in a semi-annual report postmarked by August 31 of each year.*

PotlatchDeltic interprets the permit to require (1) a prompt oral report of deviations; and (2) a written report of deviations on the schedule set forth in Conditions 5.4.2.2 (mNSR) or 5.2.2.2 (PSD) for work practice deviations. These conditions specifically define "prompt" by prescribing the timeframe for reporting work practice deviations. Accordingly, this general notice statement is confusing: *A written notice shall be submitted within 10 working days of the occurrence.*

As you and Jacob Odekirk discussed this week, the monitoring requirements imposed by EPA in Conditions 3.2, 3.4, and 4.3.6 (mNSR); and 3.3, 3.5, and 4.1.4 (PSD) are unprecedented in our industry, and commercial kilns are not equipped to conform to EPA's monitoring requirements, complicating the data collection and evaluation in real time. The Wellons kiln does not control heat by zone with any precision. Each zone is

impacted by the ambient heat from the adjacent zone and there is no alarm system to track changing kiln conditions. The kiln vendor (Wellons) cannot provide an automated system to collect and record zone data in real time. Consequently, the monitoring requirements result in voluminous data values per kiln charge that must be manually evaluated and reviewed to determine compliance or detect a deviation. As a result, PotlatchDeltic has no mechanism for instantaneous detection and real time reporting of deviations.

Under the circumstances, reporting "within 10 working days of the occurrence" under Conditions 5.4 (mNSR) and 5.2 (PSD) is impractical. Reporting as scheduled in Conditions 5.4.2.2 (mNSR) or 5.2.2.2 (PSD) is achievable, however, more information on the work practice deviations will be provided in the semi-annual report, unless requested sooner by EPA.

PotlatchDeltic requests that these deviation reporting provisions be clarified in the mNSR and PSD permits and in the future Title V operating permit by deleting "*A written notice shall be submitted within 10 working days of the occurrence*" to avoid confusion and ensure compliance with reasonable reporting. In addition, PotlatchDeltic requests revision of the deviation reporting schedule set forth in 5.4.2.1 (mNSR) and 5.2.2.1 (PSD), because reporting excess emissions deviations with 48 hours of the event is impossible and impractical for the same reasons described above.

If you have any questions, please contact Jacob Odekirk at (208) 245-7503.

Steve Henson

Plant Manager
PotlatchDeltic Land and Lumber, LLC
St. Maries Complex - Lumber Drying Division

cc: Les Higgins – Air Quality Manager – Coeur d'Alene Tribe
Jacob Odekirk – Environmental Manager - St. Maries Complex - Lumber Drying Division